calls within the PSTN; (6) give each carrier the flexibility to select the technologies most compatible with its network; (7) be reciprocal (*i.e.*, migration to and from incumbent LECs is handled in the same manner) and competitively neutral; (8) be cost effective, add to consumer welfare and allow costs to be fairly recovered; and (9) permit full compliance with the Communications Assistance For Law Enforcement Act (12).

The MCI Metro plan is unacceptable for the following reasons: (1) substituting a carrier portability code for the dialed NPA accelerates number exhaust and makes call routing more difficult, thereby increasing call set-up time; (2) some existing operator services, such as busy line verification could be impaired; and (3) the proposal does not support location portability (13-14). The GTE proposal (*i.e.*, utilizing the 700 SAC) is unacceptable as a long-term solution because it requires customers to change numbers (14). Both the AT&T and the U.S. Intelco solutions would use only one numbering resource per line, not impair existing services, and provide efficient call routing. However, because these solutions would both require extensive hardware and software modifications to the PSTN, neither should be implemented until their costs and benefits are carefully evaluated (14-15).

Cost recovery:

Cost recovery rules should be deferred until a technical solution is reached (9). However, in promulgating cost-recovery rules, the FCC should ensure that costs are recovered equitably from all "cost-causers," and the rules are competitively neutral (21).

Interim measures regarding number portability:

The interim measures currently available satisfy the present need for service provider number portability, and should be carefully studied prior to implementing new measures (4). RCF provides a reasonable interim solution if priced on a per path basis (rather than a per number basis) at rates adequate to compensate the LEC for network usage plus a reasonable contribution (4-5). In evaluating RCF, the FCC should be aware of the following inaccuracies/ambiguities in the NPRM: (1) Bell Atlantic's network supports caller ID, directory assistance, directory listings, and call detail reporting for calls forwarded with RCF; (2) RCF is *not* capable of handling only a limited number of calls to customers of the same service provider at any one time; and (3) incumbents should receive interstate access fees for calls routed to their network, especially given that CLECs have claimed the right to impose local termination charges on LECs that port customer calls (5-7).

Flexible DID is another possible interim solution. Flex DID can ameliorate number exhaust concerns and does *not* necessarily limit the number of calls that can be sent to customers of the same CLEC at any one time (7). Efforts to develop interim measures

beyond RCF and DID should remain voluntary until the alleged competitive advantages of service provider portability are proven (8).

500 and 900 service provider portability:

Development of service provider portability for 900 and 500 services is premature because it is unclear whether demand will justify the implementation costs, and there are many technical difficulties involved beyond simply modifying the 800 data base (22-23). However, if the FCC decides to forge ahead with such rules, it should do so in a separate docket, given the differences between geographic and non-geographic number portability (23-24).

BELL ATLANTIC NYNEX MOBILE

Interest: Cellular service provider

The FCC's role in number portability:

The need for federal preemption is particularly compelling for CMRS, which operate without regard to geographic boundaries (5). The Commission should preempt the states from imposing number portability obligations on CMRS carriers (5).

Services excluded from number portability:

The Commission should not develop regulations for wireless portability in this proceeding (1). There is no "clear cut need" for wireless portability because of the degree of competition, the lack of demonstrable demand (2), wireless numbers have less business value than wireline numbers (3), and the inherent physical portability of wireless phones (3). Portability should not be considered until the Commission resolves pending CMRS proceedings dealing with equal access, interconnection, resale, and other matters (3). Wireless portability would raise significant technical problems relating to roaming and fraud prevention (4-5). The industry should address these issues, and then the Commission can determine whether solutions are cost-justified (5).

CALIFORNIA CABLE TELEVISION ASSOCIATION

Interest: Association of cable TV operators planning to compete with LECs

Importance of number portability:

Absent true long-term number portability, competition will not flourish in the local telephone market (2).

Service provider number portability:

The Commission should focus only on service provider portability at this time, as the CPUC has done (5). Studies show service provider portability has overwhelming competitive significance (5-6). Trying to implement all three types of portability simultaneously will delay and increase the costs of service provider portability (7).

Service portability:

There is little evidence of public demand for service portability (6).

Location portability:

There is little evidence of public demand for location portability, and consumers may find it undesirable (6-7). The availability of 500 number and other wireless services currently serve as adequate substitutes for location portability (7).

The FCC's role in number portability:

If the FCC concludes it should adopt uniform federal regulations, it should ensure those regulations respect the significant progress that already has been made by the states. The Commission should focus on service provider number portability and articulate broad policy objectives, and establish and enforce meaningful deadlines (3). Speedy implementation of service provider portability should be a precondition to other forms of regulatory relief desired by the LECs (7-8). The Commission should not foreclose California's number portability rules -- there will not be divergent and incompatible state solutions because many of the participants are the same from state to state (8).

Interim measures regarding number portability:

As the CPUC has recognized, current short-term portability measures are not true solutions and cannot substitute as long-term alternatives to a permanent data base solution (3).

CALIFORNIA PUBLIC UTILITIES COMMISSION

Interest: State regulator.

Importance of number portability:

Supports number portability as pro-competitive (2).

Service provider number portability:

Essential for the development of local exchange competition (5). Until it carefully reviews the underlying methodologies, the FCC should not put too much stock in studies which disparage the importance of service provider portability as an inducement to customers to change carriers (6-7).

Service portability:

Not as important as service provider portability (5).

Location portability:

Not as important as service provider portability (5).

The FCC's role in number portability:

States should be allowed to continue to develop service provider portability solutions, and the FCC's ultimate plan should be compatible with these state solutions (2). It is possible that a multitude of local area service provider portability solutions may not conflict with nationwide numbering solutions (3).

California has already ordered LECs to provide interim portability through remote call forwarding (RCF) at the LECs' direct embedded cost and formed an industry task force to draft a service provider number portability implementation plan by 1/31/96. Given the advanced state of this effort, the FCC should allow states one year to develop standards, after which the FCC may make technical adjustments if it finds the state standards to be defective (3-4).

Long-term solutions regarding number portability:

No comment on specific plans until task force completes report (5). However, does not support plans such as GTE's, which require customers to change to a 700 number prior to acquiring service provider portability, thereby defeating the purpose of such portability (6).

Cost recovery:

As an interim measure, in California, LECs must provide interim portability through RCF at the LECs' direct embedded cost (8).

In formulating cost recovery rules, the FCC should consider the following issues: (1) the impact of any rules on CLECs and LECs; (2) the impact of any rules on intra- and inter-state corporations; (3) which entity should perform cost studies; and (4) should an intercompany settlements process be implemented (9).

Interim measures regarding number portability:

California will use RCF as an interim solution. However, because RCF is wasteful of numbering resources, California is developing a more parsimonious long-term solution (8).

Services excluded from number portability:

Because it may not be economically or technically feasible to provide wireless-wireless or wireline-wireless service provider portability immediately, such portability should only be included in the long-term portability solution, not the interim solution (7-8).

CELLULAR TELECOMMUNICATIONS INDUSTRY ASSOCIATION

Interest: Trade association of wireless carriers and manufacturers.

The FCC's role in number portability:

Given the unique requirements of wireless networks, the FCC should permit the wireless industry and its standards setting bodies to promulgate portability standards. A good model for such industry standard setting is the administration of the NANP, where the NANC will make policy decisions and promulgate standards, with supervision from the FCC (11-12).

Interim measures regarding number portability:

Prior to the promulgation of wireless portability standards, consumer demand for portable CMRS numbers can be satisfied through the use of the 500 SAC and perhaps other designated non-SAC portable NPA/NXXs (11).

Services excluded from number portability:

Cellular networks rely on IS-41 signalling rather than SS7 signalling. IS-41 does not route calls based on the NPA-NXX digits, but rather on the system identification code. Thus wireless number portability is technically infeasible in the near-term because of these signalling, routing and translation incompatibilities (4-6). In addition, the following technical and policy issues must be resolved prior to mandating wireless numbering: (1) wireless networks need to be modified to accommodate new number port addresses; (2) new test procedures will need to be developed due to required modification of existing roaming functionalities; (3) redundant and back-up systems must be updated; (4) rating and billing modifications will be required; (5) anti-fraud mechanisms must be supported; (6) mobile 911 calls must be correctly routed; (7) new procedures must be created for routing repair calls; and (8) law enforcement needs must be supported (6-7). The FCC should take note of the fact that Illinois excluded wireless providers from its portability mandate due to the complexity of the issues presented (7-8).

Number portability is less important in wireless services than in wireline services for the following reasons: (1) mobility is already available in wireless services; (2) there is already sufficient competition in the wireless industry; (3) even with service provider portability, wireless customers still might have to change CPE (*e.g.*, handsets) in order to change service providers (*e.g.*, from cellular to PCS); (4) wireless customers make many more calls than they receive; (5) wireless numbers are unlisted; and (6) wireless customers change providers rapidly even without number portability (8-10).

CINCINNATI BELL TELEPHONE COMPANY

Interest: LEC

Importance of number portability:

Service provider number portability:

CBT's customers attach some importance to retaining their telephone numbers. Service provider portability may be important to business customers depending on incremental cost, but is one of a number of factors they would consider in deciding whether to change service providers. The dominant considerations are price differential and service reliability (2). For residential customers, service provider portability is more a matter of convenience than necessity (3).

Service portability:

Service portability is important to many customers, and its absence could have a chilling effect on movement to more advanced services. It should be a part of any long-term number portability solution (3-4).

Location portability:

CBT has not seen customer need for broad geographic location portability. Demand for regional or nationwide location portability is very limited at present and would involve huge costs (4). If required, location portability should be limited to rate centers within a particular LATA (4-5).

The FCC's role in number portability:

The Commission should assert a leadership role and impose flexible time lines for implementation (5-6). States should continue testing various proposals in market trials, while remaining mindful that they must ultimately conform with the FCC's long-term policy (6).

Long-term solutions regarding number portability:

Any long-term plan should achieve maximum routing efficiency through minimal data base queries and provide for timely and accurate call rating (6). The "N-1" approach is best because it recognizes that ultimately, to incorporate limited geographic portability, a data base query may be necessary on all originating calls (9).

Cost recovery:

The cost of implementing portability in CBT's territory would be between $20 and $60 million (10). Number portability should be an optional service, which customers can elect to pay for; it should not be considered part of universal service (10). Initial investment should be equitably divided among all local service providers, IXCs, and wireless service providers; annual costs should be paid by customers taking the service (10 & n.19).

Interim measures regarding number portability:

Interim solutions will create risks of arbitrary degradation or loss of advanced services such as Caller ID and SS7, incur substantial and temporary implementation costs, and cause confusion (7).

CITIZENS UTILITY COMPANY

Interest: Holding company for traditional and competitive local and interexchange service providers

Importance of number portability:

Number portability is important to competition and economic and technically feasible (2). It enable end users to take control over their telecommunications purchasing decisions (3).

Service provider number portability:

85 percent of sales contacts by ELI (a Citizen sub providing competitive local services) are terminated when the potential customer is advised of the need for a number change, even where ELI was able to offer a discount greater than the 12 percent Pacific Bell claims is necessary to overcome the lack of portability (4). Without portability, new competitors are limited primarily to start-ups, which are small, prone to bad debt, hard to identify, and may be located outside multi-tenant locations (5).

Service and location portability:

Service and location portability could provide benefits, but are not essential for the development of local competition and raise more complex implementation issues (6). At this time, the Commission should only require that service provider portability solutions are compatible with future evolution to include service and location portability (6-7).

The FCC's role in number portability:

The Commission should adopt a time frame for implementation of service provider portability, working hand-in-hand with existing state efforts (including allowing more ambitious state deadlines) (7-8). Tier 1 LECs should make interim number portability available to authorized LECs within 90 days, including remote call forwarding priced not greater than total service long run incremental cost (8). Data base solutions should be required within 18 months in the 100 largest MSAs and within 18 months of a bone fide request elsewhere (8). The Commission also should establish minimum functional requirements and interoperability standards, including service provider portability within a local calling area, capability to evolve to service and location portability and to support all industry segments (including wireless), minimal use of limited number resources, no

meaningful loss of service quality or features, and compatibility with E911 and directory assistance (9).

Long-term solutions regarding number portability:

The commission should require that each local number portability system be able to accept the standard Bellcore TCAP message query format and respond with a translated number allowing for correct routing and rating (10). Any long-term solution should be evaluated against the following guidelines: (a) compatibility with existing switching, signalling and billing systems; (b) cost-effectiveness; and (c) smooth migration from interim to permanent number portability (11). The "N-1" call processing scenario is preferable, at least for toll calling. The terminating access provider scenario perpetuates the LEC's monopoly control (12). The originating service provider scenario places the cost burden on that carrier, which might be far removed from the local number portability area (13). For local calls, the involved carriers will need to jointly plan trigger and call routing conventions if N-1 is to work (13).

The Commission should encourage development of regional number portability data bases, administered by an independent third party. A national data base like 800 is inappropriate because most calls are local, and distributed data bases reduce the potential for catastrophic failure (14).

Cost recovery:

Costs of implementation should be borne by all affected carriers. As in the case of SS7 and AIN, each carrier should recover its own costs. Any common costs should be equitably allocated. Costs should not be recovered through charges for co-carrier local call termination (10). Operational costs should be recovered from all users through data base dip charges or other means (11).

Interim measures regarding number portability:

Interim solutions are necessary but deficient, and should not be considered as long-term solutions. Remote call forwarding should be priced at cost (16).

500 and 900 service provider portability:

Service provider portability should be implemented within the 500 and 900 SACs (18).

COMPETITIVE TELECOMMUNICATIONS ASSOCIATION

Interest: Association of competitive interexchange carriers

Importance of number portability:

Service provider number portability:

Number portability is beneficial as an enhancement to the competitive marketplace, eliminating a major impediment to changing carriers and fostering many public benefits (6). However, it will fail to provide competitive benefits if IXCs do not also have access to a wholesale local exchange product at a price that makes resale economically viable (2-4).

The FCC's role in number portability:

The FCC should take a leadership role in fostering and directing service provider number portability to ensure continued competition in the inter-state, interexchange marketplace, as well as ensuring that effective local competition can develop, and to prevent wasteful use of the national resource of telephone numbers (4-5). As with 800 number portability, the FCC should actively set technical parameters and performance criteria for number portability, in order to insure consistency, uniformity, and timeliness. The FCC should enforce deadlines for realization of its criteria (9).

Long-term solutions regarding number portability:

Long-term portability measures should be instituted as soon as technically possible (7).

Interim measures regarding number portability:

Interim portability techniques have many deficiencies and only two attractive characteristics. The attractive characteristics are that they are available now and represent an improvement over having no portability. The deficiencies include the additional costs incurred by call forwarding services, the reliance upon a direct competitor to route calls, and other inefficiencies stemming from involving two service providers (8). Because interim number portability should not be considered sufficient as a permanent solution, the FCC should set a clear deadline, at the earliest possible date, by which true number portability must be developed and it should take an active role in ensuring the deadline is met (8-9).

THE ERICSSON CORPORATION

Interest: Manufacturer of telecommunications systems and equipment for wired and wireless networks

Importance of number portability:

Service provider number portability:

A uniform, national standard for number portability would serve the public interest because of a likely reduction in the cost of equipment or systems necessary to provide number portability and because of the importance of choice for a competitive market (1-2).

The FCC's role in number portability:

The FCC should require industry to adopt standards for number portability, because industry groups are in a better position than the FCC to understand the present and future technologies. Those standards should be subject to FCC review and approval (2).

In requiring industry to adopt standards, the FCC should set guidelines regarding (1) industry segments required to provide number portability; (2) procedures to prevent particular entities from using market position to impede development of standards; (3) a reasonable time frame for the recommended standards themselves; and (4) a requirement that the implementation of the standards be done within a reasonable time (2-3).

Long-term solutions regarding number portability:

Because each scenario referenced in the NPRM has advantages and disadvantages, the Commission's analysis should not be limited to those proposals (3).

GENERAL COMMUNICATION, INC.

Interest: Prospective competitive local service provider

Importance of number portability:

Service provider number portability:

Must be given the highest priority in order to increase competition (1). The benefits engendered by service provider portability will be similar to those engendered by 800 number portability, which has increased competition, leading to lower prices and better service (1-2).

The FCC's role in number portability:

The mandate must be national in scope in order to force incumbent LECs to comply with CAP requests for portable numbers. The Commission should require incumbent LECs to implement number portability within 2 years of a bona fide request (2-3).

Long-term solutions regarding number portability:

Any architecture ultimately implemented should ensure that all carriers have equal access to the database and an ability to originate and terminate calls (3). The architecture must also avoid uneconomic bottlenecks and undue LEC control (3). The database must be administered by a neutral third party on a competitively neutral basis.

Cost recovery:

The costs of data base administration should be recovered from all carriers utilizing the database on a per query basis (5). All carriers should bear their own costs in implementing number portability, as this will be a basic network upgrade for both the incumbent LEC and competing carriers (5-6).

Interim measures regarding number portability:

The interim measures currently offered by LECs are RCF and DID. Drawbacks of these measures include poor transmission quality, increased cost to the competitive carriers, and the involvement of the incumbent LEC in all call processing. If one of these interim measures is adopted, the new entrant should pay less for its use (4-5).

GENERAL SERVICES ADMINISTRATION

Interest: U.S. agency responsible for procurement of telecom services

Importance of number portability:

Service provider number portability:

The absence of service provider number portability is a significant deterrent to the development of local competition (4).

Service and location portability:

GSA endorses portability in these dimensions, given the mobility of government agencies and the introduction of new services (5-6).

The FCC's role in number portability:

Market forces will not drive the development of number portability because of economic interests (7). The Commission should mandate portability as forcefully as it mandated equal access (8). Strong FCC leadership is needed to ensure that a common number portability methodology can be deployed nationwide (8). The Commission should assure all technical and operational specifications are compatible on a national basis, monitor all current research, development, and implementation activities, and build a library of information on portability which could be used to provide technical assistance to state regulators (10-11).

GO COMMUNICATIONS CORPORATION

Interest: Potential competitive local service provider

Importance of number portability:

Service provider number portability:

Service provider portability will enhance local competition (2). For both business and residential customers, the value of an existing phone number is very high (3).

Service portability:

As local networks develop to accommodate provider portability, each provider will be able to accommodate service portability, so service portability is not an industry concern which the Commission needs to mandate (4).

Location portability:

Location portability involves tremendous technological issues and should not delay implementation of service provider portability (4).

The FCC's role in number portability:

Market forces will not be sufficient to create nationwide number portability (5). The Commission should mandate number portability by certain dates, pursuant to a phased approach including target dates. For service provider portability, implementation should be on a rolling plan to cover the major metropolitan areas no later than January 1, 1997 (5). The Commission should also implement incentives and penalties to encourage rapid implementation of portability, including decreasing the price of remote call forwarding each year that permanent portability is delayed (9-10).

Long-term solutions regarding number portability:

GO does not endorse any of the proposed solutions at this time, but could support any that provides for service provider portability in an expeditious manner. It cannot support GTE's proposal (6). The initial scope for portability should be the local rate area, with an exception for FX service (7).

Interim measures regarding number portability:

Interim portability measures will be unnecessary if the Commission mandates permanent portability by January 1, 1997 (7). The tremendous disadvantages of interim measures must be acknowledged (8).

GTE SERVICE CORPORATION

Interest: LEC, wireless service provider

Importance of number portability:

The importance of the different kinds of number portability must be weighed against the costs they could impose. Based on a statistically-significant national survey regarding service provider number portability and location portability, a number of preliminary conclusions can be drawn. While portability will contribute to the development of competition, competition will develop with or without it, where the primary factor will be the impact on the basic monthly rate for service. When making calls, consumers value knowing the location of the number being called. Consumers are willing to pay only a modest price for local number portability (5-6). Therefore, the FCC's policy objectives must center on implementing the most cost-effective form of number portability possible (7).

Location portability:

Geographic numbers facilitate call rating, billing, and addressing (7-8). Without geographic significance of area codes, callers will not know whether the calls are local or toll, or the time of day at the called party's location (9).

The FCC's role in number portability:

Because portability is being addressed by a number of states without coordination, it is incumbent upon the FCC to ensure that a uniform national plan is adopted, including interoperability and uniform industry standards (21). The states have valuable insights, and they should set implementation timetables appropriate for their jurisdictions once the FCC has established guidelines. The FCC should establish a reasonable timetable for industry to develop standards necessary to implement the chosen architecture (22).

Long-term solutions regarding number portability:

The proposed solution for location portability is to designate specific non-geographic numbers. This solution would limit any routing delay to those non-geographic numbers (9-10). Because the location of the called customer may not be known, toll calls would be indicated by an announcement (13). 911 type calls and Operator Services calls could be handled by indicating the caller's Network Routing Number (13).

Regarding service provider portability, intuition and GTE's cost estimates suggest that by minimizing the network changes required to enable number portability, GTE's solution will cost the industry and telecommunications users significantly less than any of the other proposals. GTE estimates that its proposal would cost approximately $35 million and that a geographic number solution of the type suggested by AT&T would cost approximately $1.65 billion. These costs are for GTE alone--not the entire industry (14-15).

GTE's proposed solution has many advantages over other proposed solutions, including ease and speed of implementation because of compatibility with the existing system, efficiency of routing because only particular numbers need be processed, provision of both service provider portability and location portability, the minimization of implementation costs, and easy identification for portable numbers (15-18). It would not disrupt existing 911 services and would not add any additional steps that could introduce errors to the process (18). Each proposal must be evaluated in terms of its ability to provide both service provider and location portability (23). This solution can also accommodate 500 and 900 portability and serve as a model for those services (24-25).

Because other proposals support portability only partially, full number portability will require additional planning and implementation in the future. Other proposals require new methodologies for call routing and a dismantling of the existing system and infrastructure at a tremendous cost, as well as a newly designed network management (18-20). Those proposals may require the largest expenditure for the implementation of a single functionality in the history of telecommunications, and may take years to implement (20-21).

Cost recovery:

Like any discretionary service, the costs should be recovered from those benefitting from the feature (15).

900 service provider portability:

The system designed to route 800 calls cannot be modified "easily and inexpensively" to accommodate 900 numbers, and the present demand for 900 service does not justify the significant investment required to make 900 numbers portable (24).

500 service provider portability:

An industry body, overseen by the FCC, should be chartered to develop a detailed plan for the development of a nationwide PCS N00 database within a reasonable time frame. The final plan should include recommendations for ownership and operation of an N00 service management system (23-24).

Other:

Appendix A: "LNP Implementation Cost Estimates"

Appendix B: "Key Attributes of an LNP Network Architecture"

GVNW INC./MANAGEMENT

Interest: Consulting company representing the interests of small LECs

Importance of number portability:

The FCC should explore carefully the costs associated with number portability. State public utilities commissions have generally pursued ratemaking strategies in their jurisdictions that allocated costs away from local residential rates. Imposing additional costs for number portability may only exacerbate an already difficult situation where the introduction of competition results in price changes very different from that intended or expected. (3-4)

Location portability:

Many benefits come from the current system that would disappear with full number portability, such as distinguishing the cost of a call by the need for 1+ dialing. In addition, most numbers would require 10 digit dialing rather than 7. Many customers routinely move each year and are used to informing friends and relatives of their new phone number. (4-5) Numerous changes would be required by implementation of number portability. Identification of the costs of making these changes and implementing revised procedures cannot be provided since there is too much uncertainty as to how they might be accomplished and the technology needed. The FCC should move slowly so as to not burden customers with the costs of services they do not need. (9-10)

Long-term solutions regarding number portability:

In a location portability scenario one cannot determine whether a call is local, intraLATA or interLATA until a database is queried to determine the actual terminating location of a call. Therefore, it would appear that only the originating service provider scenario which requires flash-cut implementation across the country can be used to implement a location portability scenario. (11-12)

Cost recovery:

Full implementation of location number portability would be an expensive proposition. The imposition of a specific timetable for implementation of upgrades to accommodate portability will raise costs for consumers. (7-8)

Services excluded from number portability:

In rural areas, where the costs of providing service are relatively high and customer densities are low, competition is limited in the provision of many services. Competitors will likely not come to some areas, not because number portability is not available, but because the economics of the market does not justify competing providers. The imposition of such costs in an area where competitive entry is not justified will simply increase costs to the service provider and consumers without increasing choices or providing better service. The FCC should avoid establishing any universal mandates for provisions of service number portability. (6-7)

500 service provider portability:

Implementation of location portability should start with optional numbers such as 800 and 500 number which give individual customers the option of obtaining a non-geographic number and paying for the costs of such implementation. Demand for such services can be gauged by the demand for these services to determine whether such capabilities should be extended to all numbers. (10-11)

ILLINOIS COMMERCE COMMISSION

Interest: State regulatory agency

Importance of number portability:

Service provider number portability:

The Illinois Commerce Commission ("ICC") found lack of number portability to be a deterrent to customers switching local carriers. Therefore, the ICC ordered the Number Portability Task Force to develop an implementation plan for number portability in Illinois, and ordered Ameritech to tariff interim portability measures including foreign exchange service, RCF, enhanced RCF, and DID at cost-based rates (3-4).

Location portability:

In order to maintain the well established link between phone numbers and geographic locations, location portability should at least temporarily be confined to the 500 SAC (13). To allow for the future implementation of location portability, the Task Force is developing a proposal in which NXXs would continue to be associated with the existing rate centers of incumbent LECs for the purpose of billing. As rates become less distance sensitive, location portability might become more acceptable (13-14).

The FCC's role in number portability:

For the following reasons, the FCC should not take any steps that would interfere with the ability of Illinois or any other state to implement their own number portability plans: (1) in order for Ameritech's interLATA service trial to proceed, number portability must be available to create local competition; (2) a phased approach, beginning with competitive areas such as Chicago, is more technically and economically feasible than a nationwide flash cut; and (3) states can serve as laboratories for possible national plans (9-10). The FCC should allow Illinois and other states to make later filings in order to inform the FCC of their progress. In addition, the FCC might consider the establishment of a federal-state joint board to develop nationwide portability policies (11).

Clear guidance from governmental bodies is necessary to ensure the rapid implementation of number portability. If national portability is ultimately implemented, the FCC must give this guidance (15). Because certain industry segments might not wish to see number portability implemented, once such portability has been determined to be in the public interest, regional deadlines might be appropriate (15).

Long-term solutions regarding number portability:

The Task Force has determined that its ultimate solution should be compatible with a national solution, expandable to location and service portability, and allow for expansion to wireless carriers when feasible (4-5).

Illinois has chosen the Location Routing Number (LRN) model as a long-term solution. Under this model, each end office switch of each local service provider will be assigned a 10 digit number in the form NPA-NXX-XXXX. This LRN will be stored in a database record with each customer's telephone number, allowing calls to be routed on the first 6 digits of the LRN (7-8).

The FCC must be careful not to conceptualize number portability as a service offered by incumbent LECs, but rather as a service offered by the telecommunications industry as a whole. Thus, it is possible that future NXX codes should be assigned by area rather than by carrier (12).

Interim measures regarding number portability:

The Task Force has adopted a near-term goal to implement service provider portability for wireline carriers in the Chicago LATA by the fourth quarter of 1996 (4). Depending upon the time required to implement LRN, interim measures may or may not be mandated (8).